BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CAMPBELL
TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS ROBINSON
(UPS/USPS-T34-17)

The United States Postal Service hereby provides the response of witness Campbell to the following interrogatory of United Parcel Service: UPS/USPS_T34-17 (filed on March 9, 2000). The interrogatory has been redirected from witness Robinson to witness Campbell for response.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 March 23, 2000

RESPONSE OF WITNESS CAMPBELL TO INTERROGATORIES OF UNITED PARCEL SERVICE REDIRECTED FROM WITNESS ROBINSON

UPS/USPS-T34-17.

Refer to your testimony on page 19, where you propose a pickup fee of \$10.25, based upon an estimated weighted average cost for pick-ups of \$10.01. Does the proposed \$10.25 fee exceed the estimated pickup cost for: (i) Express Mail? (ii) Priority Mail? (iii) Standard (B) Parcels?

RESPONSE:

I did not individually study the pickup costs of Express Mail, Priority Mail, or Standard (B) Parcels. Therefore, I cannot answer the question.

DECLARATION

I, Chris F. Campbell, declare under penalty of perjury that the foregoing answers are true to the best of my knowledge, information and belief.

Chris F. Campbell

Dated: 3-23-00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

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